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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

INNOVATIV MEDIA GROUP, INC.; TTP8,
LLC

Plaintiffs,

vs.

MICHAEL BEYS; RICHARD DE SILVA;
LATERAL U.S. OPPORTUNITIES FUND
AI, L.P.; LATERAL U.S. CREDIT
OPPORTUNITIES FUND QP, L.P.;
LATERAL CREDIT OPPORTUNITIES,
LLC; LATERAL INVESTMENT
MANAGEMENT, LLC; LATERAL FTE
FEEDER, LLC; LATERAL JUSCOM
FEEDER, LLC; FTE NETWORKS, INC.

Defendant.

Case No. 2:22-cv-001184-JCM-EJY

(Consolidated with Case No. 2:22-cv-01362)

**STIPULATION AND ORDER
EXTENDING BRIEFING DEADLINES
FOR DEFENDANTS' MOTION TO
DISMISS OR, ALTERNATIVELY, FOR
SUMMARY JUDGMENT [ECF NO. 93]**

(SECOND REQUEST)

Plaintiffs Innovativ Media Group, Inc. ("Innovativ") and TTP8, LLC ("TTP8," and with Innovativ, "Plaintiffs"), and Defendants Michael Beys, Richard De Silver, Lateral U.S. Opportunities Fund AI, L.P., Later U.S. Credit Opportunities Fund OP, L.P., Lateral Credit Opportunities, LLC, Lateral Investment Management, LLC Lateral FTE Feeding, LLC, Lateral Justcom Feeder, LLC and FET Networks, Inc. (collectively, "Defendants," and with Plaintiffs, "the Parties"), by and through their respective counsel of record, hereby stipulate and agree and jointly request as follows:

1. On December 6, 2023, Defendants filed ECF No. 93, titled "Defendants': (1) Renewed Motion to Dismiss, or, in the alternative for Summary Judgment as to original

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1 claims in Case No. 2:22-cv-01184 pleaded in Amended Complaint [ECF 34]; And (2)
2 Renewed Motion to Dismiss Innovativ's claims in Consolidated Case No. 2:22-cv-01362-
3 CDS-VCF, Amended Complaint [ECF 52]."

4 2. Plaintiffs' opposition was due December 27, 2023, but on December 20,
5 2023, the Parties entered into a stipulation [ECF No. 95] to extend briefing deadlines, which
6 the Court reduced to Order [ECF No. 96] on December 22, 2023, moving Plaintiffs'
7 deadline to February 2, 2024.

8 3. Since the Parties' first stipulation, one of Plaintiffs' counsel suffered from
9 pneumonia, causing him to be unable to prepare Plaintiffs' opposition, while the other of
10 Plaintiffs' counsel had a newborn baby in the same time period.

11 4. The foregoing being submitted as good cause for an additional extension, the
12 Parties now jointly request, stipulate, and agree to modify the existing deadlines as follows:

13 a. Plaintiffs' deadline to file a response to Defendants' Motion [ECF No.
14 93] shall be extended from February 2, 2024 to **February 16, 2024**; and,

15 b. Defendants' deadline to file reply to their Motion shall be extended
16 from February 16, 2024 to **March 1, 2024**.

17 Dated this 31st day of January, 2024

Dated this 31st day of January, 2024

18 **MARQUIS AURBACH**

LEX DOMUS LAW

19 By: /s/ Chad F. Clement

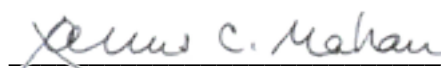
By: /s/ Daniel S. Cereghino

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ORDER

24 DATED: February 5, 2024

25 
26 UNITED STATE DISTRICT JUDGE
27
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